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Attorneys for Defendants JP Morgan Chase Bank N.A.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**Eugene Division**

JOE and TERI GOSCHIE,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

Case 6:10-cv-06424-AA

**UNOPPOSED MOTION FOR EXTENSION  
OF PRETRIAL DEADLINES**

**L.R. 7.1 CERTIFICATION**

Counsel for Defendant JP Morgan Chase Bank, N.A., as acquirer of certain assets of Washington Mutual Bank from the Federal Deposit Insurance Corporation as receiver ("Defendant" or "Chase"), has consulted with counsel for Plaintiffs and Plaintiffs agree to the requested extension.

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**MOTION**

Chase hereby moves the Court for an Order extending the discovery and dispositive motion deadlines to allow the parties additional time to complete discovery and attempt to settle this case. The current date for discovery to be complete is December 6, 2013. The deadline to file dispositive motions is January 6, 2013.

On June 6, 2013, the court denied Chase's Motion to Dismiss Plaintiffs' Second Amended Complaint. Thereafter, the parties exchanged additional written discovery concerning the claims alleged in Plaintiffs' Second Amended Complaint in August and September 2013. However, the parties were not able to reach an agreement regarding the proper scope of several discovery requests. As a result, Plaintiffs filed a Motion to Compel discovery on or about September 13, 2013. The court issued its ruling on October 25, 2013, which provided the parties with useful guidance on the scope of discovery moving forward. The parties are in the process of working cooperatively to exchange final written discovery documents, including certain medical records, which required the entry of a stipulated protective order. The parties are also in the process of conferring regarding scheduling the supplemental deposition of plaintiff Teri Goschie and certain Chase-related depositions, many of which may involve out-of-state witnesses. The parties hope to conduct some of the depositions in December. However, the parties anticipate that many of the depositions will occur in January given the logistical and scheduling difficulties associated with the holiday season.

Based on the foregoing, in an abundance of caution, Chase respectfully requests that the discovery deadline be extended to January 17, 2013, and that the dispositive motion deadline be extended to February 14, 2014. This motion is not made for the purposes of delay. As set forth

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above, the parties have shown good cause why the deadline should be modified and have recommended a new date for the deadlines in question, as required by LR 16-3.

DATED this 19th day of November, 2013.

MARTIN, BISCHOFF, TEMPLETON,  
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By: /s/ Michael A. Yoshida  
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Attorneys for Defendants JP Morgan Chase Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that, on this date, I filed the foregoing UNOPPOSED MOTION FOR EXTENSION OF PRETRIAL DEADLINES via the U.S. District Court's CM/ECF Electronic Filing System. In addition, a true copy of this document was mailed to:

Clerk of the Court  
U.S. District Court, Eugene Divisional Office  
Wayne L. Morse US Courthouse  
405 East Eight Avenue, Suite 2100  
Eugene, OR 97401

I further certify that by filing said document via the U.S. District Court's CM/ECF Electronic Filing System, a copy thereof was served on the following parties:

William Sherlock  
Hutchinson Cox Coons et al  
777 High St Ste 200  
PO Box 10886  
Eugene OR 97440

Of Attorney for Plaintiffs

DATED: November 19th, 2013.

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